

**ASHLAND/NSP LAKEFRONT SITE
MAY 15, 2004 PROGRESS REPORT (No. 6)
WDNR BRRTS #02-02-00013
CERCLA Docket No. V-W-04-C-764
USEPA ID# WISFN057952**

This is the sixth progress report prepared in accordance with the Administrative Order on Consent (AOC) for the Ashland/NSP Lakefront Site, effective November 14, 2003. This report covers activities completed in April 2004. It is intended to meet the requirements described in Task 8 of the Statement of Work appended to the AOC.

Field Activities Completed

Smelt sampling was completed in accordance with URS's work plan addendum for smelt sampling, and USEPA's April 14, 2004 email approval. Smelt specimens were collected during the evenings of April 20 and 21, 2004, at the height of the seasonal run in the Ashland area. Reference specimens were collected using seine nets at the first specified reference station at Pamida Beach on the east side of the City of Ashland on the evening of April 20; however, there was no sample recovery at the second reference station on that date, the Bayfront power plant "hot pond" on the west side of Ashland, because of turbid water.

The original sampling plan for the affected sediments area indicated the same seine netting procedure would be followed in this area. However, after conferring with USEPA and the WDNR, the URS sampling team obtained a fyke net and secured a boat to install a fyke net in the affected area on April 21, 2004. This effort yielded sufficient samples to complete work at this sampling location. Later that evening, the team attempted to collect specimens using seine nets west of the hot pond in the Fish Creek area. This attempt yielded the same results as the hot pond, because water clarity was poor.

On the morning of April 22, 2004, the team purchased smelt specimens from a local smelter that reportedly captured these specimens at a beach approximately 1/8-mile east of the Americinn Motel on the east of Ashland. These specimens were logged as the second reference station. All of the specimens were sent to the Burlington, Vermont Severn Trent laboratory on Friday, April 23, 2004 for Saturday delivery.

The coal tar removal system operated sporadically during April and consequently collected only a small volume of free-product. This was because the transfer pump from the sump connecting the oil water separator and the free-product tank continued to perform poorly, and required substantial repair. Coleman Engineering has ordered parts for the pump should replace these parts during May. As of April 27, 2004, 355 gallons of free-product were measured in the collection tank. The April laboratory results for the interim system monitoring program are included in Appendix A.

Reporting Activities Completed

This report includes the tabulated data of groundwater analyses results from the March quarterly sampling event. Data of note includes the following:

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- The sample from MW-4B yielded benzene at 15,000 ppb, and total VOCs of 44,180 ppb. This compares to benzene of 16,000 ppb and total VOCs of 33,980 ppb in the adjacent, shallower MW-4A. These concentrations are consistent with past contaminant levels at MW-4A, but as stated in the previous report (Progress Report No. 6) these levels at MW-4B are significant increases since the previous data has yielded very low levels. It is likely that the concentration of contaminants in the shallow portion of the aquifer has degraded the PVC pipe in the deeper well causing contaminant incursion. These same conditions are likely occurring at other wells at the MW-13¹ and MW-9 well nests, which are installed through the thickest portions of the free-product plume. Although the work plan now under review does not discuss replacement of these wells, it should be considered during the RI.
- The sample from MW-2C, installed in the bedrock during December, 2003, yielded benzene of 0.52 ppb and total VOCs of 2.7 ppb. These trace levels are comparable to the values measured during the December event, and confirm that the mass of contamination in the dissolved phase plume has not reached the bedrock.

The tabulated data is labeled 'Draft – Unvalidated Data' because the validation report of the March data has not yet been received. The laboratory results are included in Appendix B.

Field Activities Planned

The April 14, 2004 USEPA approval included installation of the monitoring wells proposed for screening in both the fill and the Copper Falls aquifer at Kreher Park. These wells will be installed beginning the week of May 10, 2004. This work should be complete by the end of the week of May 17, 2004. Thirteen wells at five locations are planned. The wells will be installed using a conventional auger drill rig in accordance with the Revision 01 work plan. The wells will be developed in preparation for the June quarterly sampling event.

Coleman Engineering will continue to monitor the tar removal system on a weekly basis during May; this will include parts replacement for the transfer pump discussed above.

Reporting Activities Planned

Environmental Data Systems (EDS) indicated it will complete its validation report for the March analyses results during May. Consequently, the EDMAN submittal of the March

¹ MW-13B has an obstruction that has historically prevented complete sounding of the well.

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data will be submitted with the June report.

Xcel Energy is prepared to respond to comments to the Revision 01 RI/FS Work Plan draft Planning Documents upon receipt.

Attachments:

Table 1 – March 2004 Groundwater Monitoring Results - VOCs
Table 2 – March 2004 Groundwater Monitoring Results - SVOCs
Table 3 – March 2004 Groundwater Monitoring Results – Inorganics
Table 4 – Remediation System Water Quality Monitoring Results
Table 5 – Remediation System Air Monitoring Results
Table 6 – Summary of Coal Tar and Groundwater Volume Removed

Appendix A – April System Monitoring - Laboratory Reporting Forms
Appendix B – March Quarterly Sampling Event - Laboratory Reporting Forms